

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SOMERVILLE PUBLIC SCHOOLS,
167 Holland Street
Somerville, MA 02144

Civil Action No. 1:25-cv-10677

and

EASTHAMPTON PUBLIC SCHOOLS
50 Payson Avenue
Easthampton, MA 01027

and

AMERICAN FEDERATION OF
TEACHERS,
555 New Jersey Avenue N.W.
Washington, D.C. 20001

and

AMERICAN FEDERATION OF
TEACHERS MASSACHUSETTS,
38 Chauncy Street
Suite 402
Boston, MA 02111

and

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL
EMPLOYEES, COUNCIL 93
8 Beacon Street
Boston, MA 02108

and

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS
555 New Jersey Avenue NW, Suite 600
Washington, D.C. 20001

and

SERVICE EMPLOYEES
INTERNATIONAL UNION
1800 Massachusetts Ave, NW
Washington, D.C. 20036

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
1600 Pennsylvania Avenue NW
Washington, D.C. 20500

and

LINDA MCMAHON, in her official
capacity as Secretary of Education,
400 Maryland Avenue S.W.
Washington, D.C. 20202

and

U.S. DEPARTMENT OF EDUCATION,
400 Maryland Avenue S.W.
Washington, D.C. 20202

Defendants.

MOTION FOR ADMISSION OF RACHEL F. HOMER
PRO HAC VICE

Pursuant to Local Rule 83.5.3, Plaintiff moves for the *pro hac vice* admission of attorney Rachel F. Homer as counsel for Plaintiff in the above-titled action. This motion is supported by the Declaration of Rachel F. Homer, filed herewith.

Ms. Homer is admitted to practice law with the bars of Massachusetts, the District of Columbia, the U.S. District Court for the District of Columbia, the U.S. District Court for the Western District of Wisconsin, U.S. District Court for the District of Maryland, the U.S. Court of

Appeals for the First Circuit, the U.S. Court of Appeals for the Fourth Circuit, the U.S. Court of Appeals for the Fifth Circuit, the U.S. Court of Appeals for the Seventh Circuit, the U.S. Court of Appeals for the Ninth Circuit, the U.S. Court of Appeals for the Tenth Circuit, the U.S. Court of Appeals for the District of Columbia Circuit, and the Supreme Court of the United States. As set forth in Ms. Homer's declaration, she is admitted and an active member in good standing with all bars of which she is a member, has not been suspended or disbarred in any jurisdiction, has no disciplinary proceedings pending against her, has not previously had a *pro hac vice* admission or other limited admission to this court revoked for misconduct, and has read and agrees to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

This motion is supported and signed by Mark B. Samburg, an active and sponsoring member of the Bar of this Court.

Dated: Washington, DC
March 24, 2025

Respectfully submitted,

/s/ Mark B. Samburg

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Mark B. Samburg, hereby certify that on March 24, 2025, a true copy of the foregoing document was electronically filed through the Court's ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

Dated: March 24, 2025
Washington, DC

/s/ Mark B. Samburg
Mark B. Samburg